

This hearing was not placed on Plaintiff's calendar through an unintentional calendaring error, and as a result, Plaintiff did not appear at the teleconference nor initiate the call. The failure to appear was not intentional nor was it the result of conscious indifference.

3. Plaintiff's counsel has reviewed the court's order noting the attempt by Defendants counsel's assistant to contact Plaintiff's counsel and the voicemail message claimed to have been left. Plaintiff counsel does not have any record of any voicemail message or call recorded. Nonetheless, Plaintiff's counsel does not shirk the responsibility to have called in; rather, only responds to this issue as noted in the order.

4. The undersigned respectfully requests that the court find that good cause existed for Plaintiff's counsel not attending the hearing that was set on March 26, 2019. Plaintiff's counsel can appear before this Honorable Court anytime upon reasonable notice should the Court deem further inquiry necessary.

Prayer

For these reasons, Plaintiff and Plaintiff's counsel respectfully request the court find that Plaintiffs' counsel did not attend the hearing because of good cause, and request that they be granted further relief to which they may be entitled.

Respectfully submitted,

BY: “/s/ Ronald Rodriguez”

Ronald Rodriguez

State Bar No. 00788306

The Law Offices of Ronald Rodriguez

A Professional Corporation

915 Victoria Street

Laredo, Texas 78040

Tel: (956) 796-1000

Fax: (956) 796-1002

Email: ron@ronaldrodriguez.com

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing has been served on all counsel of record through the Electronic Case Files System of the Southern District of Texas on this April 12, 2019.

“/s/ Ronald Rodriguez”

Ronald Rodriguez